

1 **TIFFANY & BOSCO**
2 **P.A.**

3 **2525 EAST CAMELBACK ROAD**
4 **SUITE 300**
5 **PHOENIX, ARIZONA 85016**
6 **TELEPHONE: (602) 255-6000**
7 **FACSIMILE: (602) 255-0192**

8 Mark S. Bosco
9 State Bar No. 010167
10 Leonard J. McDonald
11 State Bar No. 014228
12 Attorneys for Movant

13 09-31302

14 **IN THE UNITED STATES BANKRUPTCY COURT**
15 **FOR THE DISTRICT OF ARIZONA**

16 IN RE:

17 Alejandra Barajas
18 Debtor.

19 U.S. Bank, N.A.
20 Movant,
21 vs.

22 Alejandra Barajas, Debtor; Marueen Gaughan,
23 Trustee.

24 Respondents.

No. 2:09-bk-28083-RJH

Chapter 7

AMENDED NOTICE OF FILING MOTION FOR
RELIEF
FROM THE AUTOMATIC STAY AND
REQUIREMENT TO FILE

RE: Real Property Located at
1532 W. Burgess Ln.
Phoenix, AZ 85041

25 NOTICE IS HEREBY GIVEN that the above Movant has filed a motion requesting relief from
26 the automatic stay, the details of which are as follows:

Movant asserts that there is no equity in the property, which is the subject of the Motion for Relief from
Stay, and/or Respondent has not provided Movant with adequate protection with respect to such
property. Therefore, Movant is entitled to an Order Lifting Stay with respect to such property.

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1 FURTHER NOTICE IS HEREBY GIVEN that pursuant to Local Bankruptcy Rule 4001 if no
2 objection is filed with the court and a copy served on Movant whose address is:

3 U.S. Bank, N.A.
4 c/o Mark S. Bosco, Esq.
5 2525 East Camelback Road, Suite 300
6 Phoenix, Arizona 85016

7 WITHIN 15 DAYS of service of the motion, the motion for relief from the automatic stay may be
8 granted without further hearing.

9 FINALLY, Movant's Counsel certifies that a letter was sent seeking to resolve the issues
10 necessitating the motion, to Debtor's Counsel or the Debtor if the Debtor is without counsel and that
11 after sincere effort the parties have been unable to resolve the matter, and the letter was sent at least
12 five (5) business days prior to the filing of the motion.

13 DATED this 2nd day of March, 2010.

14 TIFFANY & BOSCO, P.A.

15 By /s/ MSB # 010167
16 Mark S. Bosco
17 Leonard J. McDonald
18 Attorneys for Movant

19 Copy of the foregoing was
20 mailed on March 2, 2010, to:

21 Alejandra Barajas
22 1747 W. Wier Avenue
23 Phoenix, AZ 85225
24 Debtor

25 Marueen Gaughan
26 P.O. Box 6729
Chandler, AZ 85246-6729
Trustee

U.S. Trustee
230 North 1st Avenue, Suite 204
Phoenix, AZ 85003-1706

By: Ismael G. Solano